UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

Reply To
Attn Of: ECL-115

August 30, 2007

James M. Anderson
DEQ Northwest Region
Portland Harbor Section
2020 SW Fourth Ave, Suite 400
Portland, OR 97201

RE: Source Control Decision
Former Marine Finance Site
8444 NW St. Helens Road, Portland, OR
ECSI No. 2352

Dear Mr. Anderson:

EPA has reviewed DEQ's Source Control Decision (SCD) Memorandum for the Former Marine Finance Site referenced above. Based on the information provided in this document, it appears that the soil erosion pathway has been eliminated; the groundwater, storm water, bank/beach erosion, and over-water work pathways have not been fully characterized. Therefore, EPA cannot agree with DEQ's determination that this facility does not appear to be a current source of Willamette River water or sediment contamination. Until the following questions and comments regarding this source control decision are addressed, EPA will consider the Former Marine Finance site as a potential source of contamination to the Portland Harbor Superfund Site. We provide the following comments for DEQ to consider in proceeding forward with its decisions regarding this site.

General Comments

1) EPA did not have copies of the referenced materials that may have offered additional information that was not provided in this document which may have answered some of the questions and/or concerns that we have with this Site. In the future, please ensure that EPA has all referenced materials for source control documents.

2) EPA agrees that it is unlikely that the DDx in the Willamette River sediments came from this site; however, there are other contaminants in the Willamette River sediments that likely came from this site. EPA does not necessarily agree with the LWG on the iAOPCs and iCOPCs; thus, we are evaluating the information based on actual data rather than the LWG's interpretation of the data. Copper, lead, PCBs and PAHs are all contaminants of concern in the sediment off-shore of this site. It appears that these contaminants are also found in the uplands. The extent of sediment contamination is unknown and will likely remain such until the remedial design work is conducted for this area. Consequently, it is difficult at this time to predict whether all the river contamination is from upland soils and/or upstream sediments or other upland pathways from this site. EPA does not currently agree that this site upland was not a significant source to Willamette River sediment.
3) It appears that the entire northwest end of the site (St. Johns bridge to property boundary) has been essentially capped (fill/pavement/building foundation) above the top of bank; therefore, as long as the integrity of the cap is maintained, it is unlikely that any contaminated soil in this portion of the site would be a source to the Willamette River via soil erosion. On the southeast end of the property where six inches of ¾-inch-0 gravel was placed, as long as the gravel cover is maintained, there is a low probability that any contaminated soil in this portion of the site would be a source to the Willamette River via soil erosion.
4) There is insufficient evidence to support the conclusion that the groundwater pathway is not complete; however, EPA views this pathway as a low priority for source control. It is unclear how the locations of the wells were selected and how they coincide with waste sources at the site. It is unclear why DEQ identified quarterly groundwater monitoring for one year at all six locations (p4, second paragraph) necessary to completely characterize this pathway, yet only three samples were taken (April 2003, July 2003 and April 2004). The chrysene concentrations found in MW-4 are also suspect; it seems that DEQ did not consider benthic organisms in its evaluation. EPA also has questions about the groundwater seep area due to the lack of discussion in this document. This was identified as a potential pathway (p5, Source Control Screening and Upland Human Health Risk Screening), yet there are no monitoring wells located in this area (according to Figure 2) and there was no further discussion of this in the document.
5) There is insufficient evidence to support the conclusion that the storm water pathway is not a source; however, EPA views this pathway as a low priority for source control. EPA is not clear as to the sampling methodology employed to collect storm water samples. EPA recommends that this site collect storm water data consistent with the storm water data being collected by the LWG.
6) There is insufficient evidence to support the conclusion that the bank/beach erosion pathway is not complete. There was no discussion of the shoreline for this site and it appears that little characterization was conducted for the bank/beach area.
7) There is insufficient evidence to support the conclusion that the over-water work pathway is not a pathway of concern. It appears that this pathway was not characterized or evaluated. This pathway is viewed to be a medium priority by EPA.

Investigative History and Hazardous Substance Releases

1) In the fourth paragraph, it indicates that five Willamette River sediment samples were collected, but Figure 2 depicts six locations. Please clarify whether five or six samples were collected.

Source Control Screening and Upland Human Health Risk Screening

Screening Results

1) The first and sixth bullets on p6 (also Post-SCM Storm Water Monitoring, p10, second paragraph) indicate that arsenic concentrations at this site are consistent with naturally occurring concentrations. Please provide the references for the studies used to determine naturally occurring concentrations of arsenic for this area.

Source Control Measures

Areas of Concern

1) In the third paragraph, it states that samples were collected using at radii of 5 feet, 110 feet, and 20 feet to determine the lateral extent of contamination. From the sample data provided in Table 1, it appears that only one sample was collected at each radii. How was the location/direction of these samples determined? Please provide a figure that depicts the locations of these additional samples.

Figure 2

1) Location of SS-8 is not depicted on this figure.
2) There are two locations depicted for SS-10. Was this a composite sample?

If you have any questions or would like to discuss the contents of this letter further, please feel free to contact me at (206) 553-6705.

Sincerely,

Kristine M. Koch
Remedial Project Manager

cc: Mark Pugh, DEQ-NW
Chip Humphrey, EPA-OOO
Eric Blischke, EPA-OOO